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February 27, 2019

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th St. SW
Washington, DC 20554

Re: EX PARTE NOTICE
WT Docket 17-200
Review of the Commission's Rules for the
896-901/935-940 MHz Band

Dear Ms. Dortch:

This letter will summarize the substance of a meeting held by teleconference yesterday with Roger Noel and Stana Kimball regarding the above-referenced Docket. Present on the call were the undersigned and, representing Southern California Edison (SCE), Amy Pressler, James McKinney, John Bubb, Carlos Carazo, and Michael Klein.

The SCE representatives explained that SCE is a large electrical utility company in Southern California serving over 15 million customers. It has been beset in recent years by increasing threats to the integrity of its networks by wildfires. It was explained that the network management functions needed to detect wildfires at their very inception and to maintain a network secure from hacking would require critical infrastructure entities to have access to their own broadband channel. While the reforms proposed in this docket would potentially create a contiguous band of sufficient size to meet these immediate needs, the proposed NPRM failed to include a mechanism for quickly relocating incumbents. It effectively would confine the incumbents to the current 900 MHz band and would entrench the largest current license holder in the band to the detriment of other potential broadband licensees, thus complicating the problem of clearing the band.

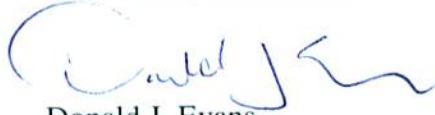
As a solution to this problem, SCE requested that the NPRM be modified to include consideration of the reallocation of another available band to handle the offloading of incumbents. The 1.4 GHz band and the 2020-2025 MHz band were suggested as a possible, but not all-inclusive, candidates. Inclusion of this proposal in the NPRM would give the Commission the option of pursuing that solution if the current channel clearing proposal is found to be too restrictive.

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Mr. Noel welcomed SCE's comments and said they would be considered along with any other comments submitted prior to the Commission's consideration of the item. A copy of the proposed addition to the NPRM is attached.

Respectfully submitted,



Donald J. Evans

cc: Roger Noel
Stana Kimball
(Attachment)

SUGGESTED INSERT IN DOCKET 17-200 NPRM

Possible insertion after para. 20 of Draft NPRM

Given the demand for capacity to meet the broadband needs of critical infrastructure licensees, we also seek comment on whether the reorganization of the 900 MHz band as described above will be adequate to satisfy both that demand and the need to accommodate the relocation of incumbent licensees. Would it speed and simplify the reorganization and transition processes to allocate from the Commission's inventory an additional 5 MHz of spectrum, as a place to relocate incumbents, foster continued critical infrastructure operations in the 900 MHz band, and/or provide additional broadband capacity for critical infrastructure in the future? "Orphaned" bands too small for typical commercial wireless usage such as the former TerreStar spectrum at 1390 MHz to 1395 MHz might be suitable for this purpose. Commenters who advocate such a reallocation should identify potential bands and set forth the benefits to be realized from such a reallocation.